

19-13936

Complaint
No. MC- **32473**

The State of Texas } Municipal Court
County of Hidalgo } Pharr, Hidalgo County, Texas

In the name and by the authority of The State of Texas

I, **Casimiro Chapa, Jr.**, do solemnly swear that I have good reason to believe and charge, that heretofore, on or about the **18TH** of **April, 2019** county of Hidalgo and State of Texas, **Candy Sue Moody** hereinafter called defendant, then and there impersonate a public servant, namely a **Child Protective Services Worker**, with intent to induce _____ to submit to the pretended official authority of the defendant or to rely on the pretended official acts of the defendant by stating that she was there to remove a child from her residence.

Affiant is Casimiro Chapa, Jr. Affiant is employed with the Pharr Police Department as a criminal investigator. Affiant had reviewed officer's reports and has good reason to believe the following facts to be true and correct.

Officer Raul Flores will testify that on April 18, 2019 at 3:30 P.M. he was dispatched to _____ in reference to a disturbance. Officer Flores will testify that he contacted the witness who advised him of the situation. Officer Flores will testify that he contacted the defendant who identified herself as a CPS worker. Officer Flores will testify that he requested work credentials from the defendant and she stated that she didn't have them. Officer Flores will testify that he further questioned the defendant about her employment with CPS and the defendant became nervous. Officer Flores will testify that the defendant then changed her story that she was employed with Edinburg Children's Hospital and was here on CPS behalf.

Affiant will testify that on April 29, 2019 at 4:42 P.M. he contacted the witness to the offense. Affiant will testify that the witness was properly identified as _____. Witness will testify that she was advised (04/18/2019) that a child protective services worker was at her residence located at Pharr, Texas. Witness will testify that she was advised that the CPS worker was there to pick up her brother's _____. Witness will testify that she arrived at location and contacted the defendant. Witness will testify that the defendant identified herself as a CPS worker. Witness will testify that that the defendant was there to remove _____ from the home. Witness will testify that she asked the defendant for identification and she failed to present any work credentials. Witness will testify that she suspected that the defendant was not a CPS worker and notified Pharr Police.

Affiant will testify that he called Edinburg Hospital and spoke to Human Resources. Affiant will testify that he inquired about the defendant's employment at location and she was not an employee. Affiant will testify that he contacted CPS and was advised that the defendant was employed with CPS, but only as external staff. Affiant will testify that he was advised that external staff are not investigators and do not hold any authority to remove children from a home. Affiant will testify that he was advised that the defendant's employment with CPS ended in 2016.

Suspect: CANDY SUE MOODY

Against the peace and dignity of the state.

Sworn to and subscribed before me this **01ST** day of **May, A.D. 2019**.



Affiant

Judge, Municipal Court
Pharr, Hidalgo County, Texas